# Departmental Findings of Fact and Order Air Emission License Amendment #1

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

### I. REGISTRATION

### A. Introduction

Millinocket Regional Hospital (MRH) of Millinocket, Maine was issued Air Emission License A-493-71-H-R on August 10<sup>th</sup>, 2006, permitting the operation of emission sources associated with their healthcare facility.

MRH has requested that their License be revised to correct the heat input of boiler HP-2 from the current input of 1.26 MMBtu/hr to the correct input of 1.93 MMBtu/hr.

This revision shall also clarify the use of #2 fuel oil which meets the criteria in ASTM D396, instead of the use of #2 fuel oil with a sulfur content not to exceed 0.35%. This revision will relieve MRH of the requirement to maintain records of fuel sulfur content.

#### B. Emission Equipment

The following equipment is addressed in this revision:

### **Fuel Burning Equipment**

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (gal/hr)	Fuel Type
HP-2	1.93	13.8	#2 fuel oil

## Departmental Findings of Fact and Order Air Emission License

### C. Application Classification

This amendment will increase emissions by less than 4 ton/year for each single pollutant and less than 8 ton/year for all pollutants combined. Therefore, this modification is determined to be a minor revision and has been processed as such.

### II. BEST PRACTICAL TREATMENT (BPT)

### A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (last amended December 1, 2005). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emission from the source being considered; and
- the economic feasibility for the type of establishment involved.

### B. Boilers

MRH operates LPB-1, LPB-2, LPB-3 primarily for facility heating and hot water. HP-1, and HP-2 are used for the sterilization of equipment.

All of the boilers have heat inputs less than 10 MMBtu/hr and are therefore not subject to the New Source Performance Standards (NSPS) Subpart Dc for steam generating units greater than 10 MMBtu/hr manufactured after June 9, 1989.

BPT for the boilers shall consist of the following:

- 1. Chapter 106 regulates fuel sulfur content, however the use of #2 fuel oil which meets the criteria in ASTM D396 is more stringent and shall be considered BPT.
- 2. Chapter 103 regulates PM emission limits for Boilers LPB-1, LPB-2, and LPB-3. The PM<sub>10</sub> limits are derived from the PM limits.
- 3. A PM emission limit of 0.12 lb PM/MMBtu shall be considered BPT for Boilers HP-1, and HP-2. The PM<sub>10</sub> limits are derived from the PM limits.
- 4. NO<sub>x</sub>, CO, and VOC emission limits are based upon AP-42 data dated 9/98.

2

## Departmental Findings of Fact and Order Air Emission License

5. Visible emissions from the stack shared by the boilers shall not exceed 20% opacity on a 6 minute block average, except for no more than one (1), six (6) minute block average in a continuous 3 hour period.

### C. Annual Emission Restrictions

- 1. The total fuel use for the facility shall not exceed 190,000 gal/year of #2 fuel oil
- 2. Generator #1 shall be limited to 500 hrs of operation on a 12 month rolling total.
- 3. MRH shall be restricted to the following annual emissions:

### Total Licensed Annual Emission for the Facility Tons/year

(used to calculate the annual license fee)

<b>Emission Unit</b>	PM	$PM_{10}$	$SO_2$	$NO_X$	CO	VOC
Boilers	1.60	1.60	6.70	1.90	0.48	0.05
Generator #1	0.13	0.13	0.23	2.78	0.60	0.22
Total	1.73	1.73	6.93	4.68	1.08	0.27

### III.AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Based on the above total facility emissions, MRH is below the emissions level required for modeling and monitoring.

#### **ORDER**

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

### Departmental Findings of Fact and Order Air Emission License

The Department hereby grants Air Emission License Minor Revision A-493-71-I-M, subject to the conditions found in Air Emission License A-493-71-H-R and in addition to the following conditions:

<u>Severability</u>. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

### **SPECIFIC CONDITIONS**

The following shall replace Condition 16 in Air Emission License A-493-71-H-R.

### (16) **Boilers**

- A. The boilers shall not exceed a facility-wide total 190,000 gallons per year of #2 fuel oil that meets the criteria in ASTM D396. Records from the supplier documenting quantity delivered and type of fuel shall be kept for compliance purposes. [06-096 CMR 115, BPT]
- B. Emissions shall not exceed the following: [06-096 CMR 115, 06-096 CMR 103, BPT]

Equipment		PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	СО	VOC
LPB-1	lb/MMBtu	0.12	-	-	-	-	-
	lb/hr	0.78	0.78	2.31	0.93	0.23	0.03
LPB-2	lb/MMBtu	0.12	-	-	-	-	-
	lb/hr	0.54	0.54	1.59	0.64	0.16	0.02
LPB-3	lb/MMBtu	0.12	-	-	-	-	-
	lb/hr	0.54	0.54	1.59	0.64	0.16	0.02
HP-1	lb/hr	0.15	0.15	0.44	0.18	0.05	0.01
HP-2	lb/hr	0.23	0.23	0.97	0.28	0.07	0.01

### Departmental Findings of Fact and Order Air Emission License

C. Visible emissions from the stack shared by the boilers shall not exceed 20% opacity on a 6 minute block average, except for no more than one (1), six (6) minute block average in a continuous 3 hour period. [06-096 CMR 101]

DONE AND DATED IN AUGUSTA, MAINE THIS	DAY OF	2007.
DEPARTMENT OF ENVIRONMENTAL PROTECTION		
BY:DAVID P. LITTELL, COMMISSIONER		
The term of this amendment shall be concurrent with A-493-71-H-R.	the term of Air Emission Licer	ıse
PLEASE NOTE ATTACHED SHEET FOR GUIDANCE	E ON APPEAL PROCEDURES	
Date of initial receipt of application: 2/8/2007  Date of application acceptance: 3/8/2007		
Date filed with the Board of Environmental Protection	on:	
This Order prepared by Jonathan Voisine, Bureau of Air Qualit	y.	